

The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102

Invoice submitted to:
Chris Glenn

Invoice # 10896

Invoice Date: 09/03/23 Terms: COD Services Through: 09/03/23 Due Date: 09/03/23
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Description Post-Confirmation Invoice in Support of Fee Application

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: Case Administration					
04/25/23	Mac VerStandig	Review client e-mail re timing of status conference; Check statute for rigors; Respond to e-mail	0.10	400.00	\$40.00
04/25/23	Mac VerStandig	Draft motion to retain existing bank accounts, reviewing applicable law under Title 11 and Title 12 as well as FDIC database and pertinent UST documents	1.40	400.00	\$560.00
04/25/23	Mac VerStandig	E-mail draft motion to retain bank accounts to client; Review client's response thereto; File same	0.10	400.00	\$40.00
04/25/23	Mac VerStandig	Call clerk's office prior to filing motion to retain bank accounts, per direction in CM/ECF system correlative to use of generic motion event	0.10	400.00	\$40.00
04/25/23	Mac VerStandig	Review order setting status conference and pertinent service obligations attendant thereto	0.10	400.00	\$40.00
04/26/23	Mac VerStandig	Introductory call with T. Kapusta to discuss contours of case and anticipated route forward	0.40	400.00	\$160.00
05/02/23	Mac VerStandig	Call with client re ongoing payment of secured obligations, need to not pay pre-petition debts, job-seeking issues, case strategy, and next steps	0.30	400.00	\$120.00
05/07/23	Mac VerStandig	Review client's tax records and draft statement pursuant to Section 1187 of Bankruptcy Code for client's review and signature	0.40	400.00	\$160.00
05/07/23	Mac VerStandig	Review stay relief/adequate protection motion filed by Ford Motor Credit, including the exhibits thereto, and e-mail counsel for lender re negotiating an adequate protection agreement for the pendency of the case	0.50	400.00	\$200.00
05/07/23	Mac VerStandig	Call with client re filing of tax returns, execution of statement concerning absence of balance sheet, motion filed by Ford Motor, appearance of Wells Fargo, and potential acquisition of corporate assets (two phone calls in rapid succession; billed as a single call but billable time would not be different if billed independently)	0.20	400.00	\$80.00
05/07/23	Mac VerStandig	E-mail with UST auditor and Subchapter V trustee re IDI; E-mail to client re pay advices	0.10	400.00	\$40.00
05/08/23	Mac VerStandig	Review, collate and file payment advices	0.20	400.00	\$80.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
05/16/23	Mac VerStandig	Call with client in advance of IDI to prepare for meeting and to discuss various case issues	0.30	400.00	\$120.00
05/16/23	Mac VerStandig	Attend IDI (telephonically)	1.10	400.00	\$440.00
05/17/23	Mac VerStandig	Call with client to review items from IDI, discuss status report, and go over next steps, with emphasis on assessing his forward-looking employment	0.20	400.00	\$80.00
05/17/23	Mac VerStandig	Draft and file pre-status hearing report	0.80	400.00	\$320.00
05/18/23	Mac VerStandig	Research, draft and file limited opposition to stay relief/adequate protection motion filed by Ford	1.10	400.00	\$440.00
05/23/23	Mac VerStandig	Zoom call with potential special counsel re strategy for approaching Minnesota receivership action	0.50	400.00	\$200.00
05/24/23	Mac VerStandig	Call with client re 341 meeting	0.10	400.00	\$40.00
05/24/23	Mac VerStandig	Exchange e-mails with trial counsel for UST and provide client's identity confirmation documents	0.10	400.00	\$40.00
05/25/23	Mac VerStandig	Attend meeting of creditors	1.20	400.00	\$480.00
05/25/23	Mac VerStandig	Follow up call with client after meeting of creditors	0.20	400.00	\$80.00
05/31/23	Mac VerStandig	Attend status conference (via telephone)	0.70	400.00	\$280.00
05/31/23	Mac VerStandig	Call with client following status conference re next steps (no charge for social portions of call)	0.20	400.00	\$80.00
06/01/23	Mac VerStandig	Review Rule 2015.3 as well as Form 426, and start assembling report for client's review, while assessing information needed from client and potential issues encountered by informality of business records of Glenn LLC	0.70	400.00	\$280.00
06/02/23	Mac VerStandig	Series of phone calls with client (47, minutes, 42 minutes, 10 minutes, and 8 minutes) to prepare 2015.3 report, amend schedules, and discuss business affairs of Glenn LLC	1.80	400.00	\$720.00
06/02/23	Mac VerStandig	Review Glenn LLC bank statements	0.60	400.00	\$240.00
06/03/23	Mac VerStandig	Collate Glenn LLC bank statements and send same to counsel for US Trustee as well as to Subchapter V trustee	0.20	400.00	\$80.00
06/06/23	Mac VerStandig	Call with client re Glenn LLC, interaction with Silver Fox receiver, and employment prospects	0.30	400.00	\$120.00
06/06/23	Mac VerStandig	Research applicability of Barton Doctrine to debtors-in-possession and search for precedent where two parties to a suit are both protected by the doctrine	0.90	400.00	\$360.00
06/15/23	Mac VerStandig	Draft declaration for employment application for A. Glasnovich	0.20	400.00 NC	\$0.00
06/17/23	Mac VerStandig	Call with client re timing of plan payments, developments with Glenn LLC business, personal job search, and status of claims register	0.20	400.00	\$80.00
06/21/23	Mac VerStandig	Review client bank statements and use same as basis to begin drafting MOR; Draft notes to accompany MOR and review bank statements for Glenn LLC; Call with client re same; File signed MOR for stub period of April 2023 and May 2023	1.30	400.00	\$520.00
06/24/23	Mac VerStandig	Call D. Glasnovitch re next steps (leave voicemail)	0.10	400.00 NC	\$0.00
06/26/23	Mac VerStandig	Call with client re Minnesota receiver's draft report	0.40	400.00	\$160.00
07/07/23	Mac VerStandig	Review e-mail from counsel for bank and call same lawyer re home mortgage and contemplated plan treatment	0.10	400.00	\$40.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
07/22/23	Mac VerStandig	Review motion to extend deadline to object to discharge, review pertinent case law on discharge in Chapter 11, check availability of certain statutory provisions to Subchapter V proceedings, and begin drafting brief in opposition to motion	2.10	400.00	\$840.00
07/22/23	Mac VerStandig	Review e-mail from counsel for receiver re extending deadline to object to discharge; respond to same	0.10	400.00	\$40.00
07/23/23	Mac VerStandig	Call with client re monthly operating report for June 2023, status of certain claim objections, pending motion by receiver to extend deadline, and feasibility of payments to be proposed in plan	0.30	400.00	\$120.00
07/23/23	Mac VerStandig	Review bank accounts, reconciling same to deduce deposits and withdrawals for month of June 2023; Draft monthly operating report for June 2023	0.60	400.00	\$240.00
07/24/23	Mac VerStandig	Call with counsel for state court receiver re pending motion to extend deadlines (no charge for portion of call addressing unrelated matter)	0.20	400.00	\$80.00
07/24/23	Mac VerStandig	Follow up call with counsel for Lighthouse re stipulation to be docketed	0.10	400.00	\$40.00
07/24/23	Mac VerStandig	Draft stipulation per agreement with Lighthouse; E-mail same to counsel for Lighthouse for review and approval	0.30	400.00	\$120.00
08/21/23	Mac VerStandig	E-mail to client re need to handle final MOR and re thoughts on exhibits for plan confirmation hearing	0.10	400.00	\$40.00
08/24/23	Mac VerStandig	Call with J. Krings re receivership efforts to assess state and ownership of certain assets and to trace financial transactions	0.30	400.00	\$120.00
08/24/23	Mac VerStandig	Zoom meeting with client, state court receiver, and J. Krings (counsel for receiver) re interplay between receivership and bankruptcy, ambiguity as to ownership of certain assets, and potential objection to discharge	0.80	400.00	\$320.00
08/24/23	Mac VerStandig	Call with D. Glasnovich re potential claims against receivership estate and/or private equity firm, preservation of Chapter 5 causes of action, and tax impact on debtor's estate	0.30	400.00	\$120.00
08/24/23	Mac VerStandig	Call with client re receivership estate's potential impact on assets and tax filings, exhibits for confirmation hearing, funding of plan, and affidavit to be executed in support of confirmation	0.20	400.00	\$80.00

Hours 22.60

Labor: \$8,920.00

Invoice Amount: \$8,920.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: Claims Administration					
04/29/23	Mac VerStandig	E-mail to client re bad address notice for Sunbelt Rentals and need to get proper address	0.10	400.00	\$40.00
06/15/23	Mac VerStandig	Review e-mail from counsel for Lund Oil and respond to same	0.10	400.00	\$40.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
06/16/23	Mac VerStandig	Call with counsel for Lund Oil re creditor's claim, potential for avoidance action vis a vis security interest, and potential compromise whereby claim is lowered in exchange for security interest remaining and plan providing for prompter payment terms	0.30	400.00	\$120.00
07/05/23	Mac VerStandig	Review claims register and distill same into categorized spreadsheet for review with client, adding undisputed/non-contingent/unliquidated claims from schedules	0.70	400.00	\$280.00
07/05/23	Mac VerStandig	Research grounds to object to claim of Delaware, including detailed review of various statutes of limitation, case law governing choice of laws, case law governing whether limitations are procedural or substantive, case law governing whether state or federal common law applies in prism of a bankruptcy claim objection, and rules governing form of a claim inclusive of interest; Draft objection to claim while researching various points, proofreading throughout; File objection and coordinate mail service of same	4.70	400.00	\$1,880.00
07/05/23	Mac VerStandig	Review claims register with client, discuss strategy for objections, and assess plan implications	0.50	400.00	\$200.00
07/07/23	Mac VerStandig	Research and draft omnibus claim objection, sorting through various claims identified by client as suspect and verifying which are sans an accompanying guaranty; Review governing rule and pull supporting caselaw as part of drafting process	2.30	400.00	\$920.00
07/07/23	Mac VerStandig	Draft objection to tardy Airgas claim, using omnibus objection as template and adding section addressing tardiness issues; Review and file same	0.40	400.00	\$160.00
07/07/23	Mac VerStandig	Research and draft objection to Border States claim, with emphasis on identifying pertinent law governing issues with signature and assessing whether or not a successor entity per se inherits guaranty of debt of predecessor in interest	2.40	400.00	\$960.00
07/12/23	Mac VerStandig	Call with counsel for Lund Oil re potential resolution of issues surrounding claim	0.20	400.00	\$80.00
07/22/23	Mac VerStandig	Exchange e-mails with counsel for Lund Oil re potential compromise of claim	0.10	400.00	\$40.00
07/22/23	Mac VerStandig	Call with client re negotiations with Lund Oil	0.10	400.00	\$40.00
08/08/23	Mac VerStandig	Call with client re JPMorgan opposition to claim objection	0.20	400.00	\$80.00
08/08/23	Mac VerStandig	Call with counsel for JPMorgan Chase re claim objection, documents supporting opposition brief, legal issues associated with absence of signature, and potential avenues of resolution	0.40	400.00	\$160.00
08/09/23	Mac VerStandig	Research and draft reply to opposition of JPMorgan Chase Bank to omnibus claims objection, with emphasis on case law governing contractual formation and locating analogous constructs where efforts exist to impose obligations on persons who did not sign agreements	3.20	400.00	\$1,280.00
08/10/23	Mac VerStandig	Review, revise, and proofread reply to opposition to objection to JPMorgan proofs of claim; File same	0.80	400.00	\$320.00
08/11/23	Mac VerStandig	Prepare and file witness/exhibit list for hearing on JPMorgan Chase claim objection	0.10	400.00	\$40.00

Exhibit A - Time and Expense Records Page 5 of 7

Date	By	Service Summary	Hours/Qty	Rate	Amount
08/11/23	Mac VerStandig	Call with counsel for JPMorgan re potential resolution of claims objections, evidentiary issues for hearing, their request to continue hearing, reasons for opposing continuance, and potential for provision of post-confirmation financing arrangement	0.40	400.00	\$160.00
08/14/23	Mac VerStandig	Prepare for hearing on objection to claim of JPMorgan Chase Bank, including review of briefing, review of statute, and review of claim documents (as well as those appended to response)	1.50	400.00	\$600.00
08/15/23	Mac VerStandig	Attend hearing on objection to claims of JPMorgan Chase Bank; Put on client testimony and argue merits of objection	0.70	400.00	\$280.00
08/15/23	Mac VerStandig	Calls with counsel for JPMorgan re potential resolution to claim objection in advance of hearing	0.10	400.00	\$40.00
08/15/23	Mac VerStandig	Meet with client in advance of hearing on objection to claims of JPMorgan Chase Bank and further prepare client for testimony, discussing critical points of objection and certain evidentiary considerations; Also discuss general case issues, including late-filed claim, and items meriting focus in advance of confirmation hearing; No charge for social time with client	0.40	400.00	\$160.00
08/27/23	Mac VerStandig	Research and draft objection to claim of RDO, including review of Pioneer precedent and different treatment of late-filed claims in Chapter 7 cases and Chapter 11 cases	2.00	400.00	\$800.00

Hours 21.70

Labor: \$8,680.00

Invoice Amount: \$8,680.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: Fee and Employment Applications					
05/24/23	Mac VerStandig	Review engagement agreement from Stinson LLP to serve as special counsel in Minnesota receivership action; Forward same to client for review	0.40	400.00 NC	\$0.00

Hours 0.40

Invoice Amount: \$0.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: Plan and Disclosure Statement					
07/22/23	Mac VerStandig	Draft plan of reorganization, including preparation of index of creditors and their respective classifications	4.10	400.00	\$1,640.00
07/22/23	Mac VerStandig	Call with client re preparation of plan and terms thereof	0.20	400.00	\$80.00
07/23/23	Mac VerStandig	Call with client to review draft plan of reorganization	0.30	400.00	\$120.00
07/23/23	Mac VerStandig	Review and revise draft plan of reorganization, including composition of exhibit delineating classification of all creditors and adjustment of treatment of certain classes vis a vis temporal hierarchy of distributions	1.50	400.00	\$600.00
07/24/23	Mac VerStandig	Review Section 507 priority scheme, and Section 1129 rigors, to ensure plan's distribution hierarchy is permissible	0.20	400.00	\$80.00
07/31/23	Mac VerStandig	Draft and file certificate of service	0.20	400.00	\$80.00

Date	By	Service Summary	Hours/Qty	Rate	Amount
08/25/23	Mac VerStandig	Draft affidavit in support of confirmation and send to client for review and signature; Review Sections 1129 and 1191 while drafting affidavit	0.40	400.00	\$160.00
08/25/23	Mac VerStandig	Draft exhibits in support of plan confirmation and speak with client to verify accuracy of assertions set forth in pro forma	1.40	400.00	\$560.00
08/26/23	Mac VerStandig	Draft and file summary of ballots	0.20	400.00	\$80.00
08/26/23	Mac VerStandig	Draft omnibus response to various plan objections, including details of proposed technical amendments to plan	1.30	400.00	\$520.00
08/27/23	Mac VerStandig	Prepare for confirmation hearing	1.00	400.00	\$400.00
08/28/23	Mac VerStandig	Attend hearing on confirmation, adduce testimony, and argue same	1.20	400.00	\$480.00
08/28/23	Mac VerStandig	Meet with client in advance of confirmation hearing and walk through testimony, discussing case in general and next steps	0.50	400.00	\$200.00
08/28/23	Mac VerStandig	Amend plan per input from hearing; File with redline and exhibit	0.20	400.00	\$80.00

In Reference To: **Plan and Disclosure Statement (Expenses)**

07/25/23	Mac VerStandig	Third party mailing service charge for mailing plan, scheduling order, and Class 4 ballots	1.00	72.02	\$72.02
07/25/23	Mac VerStandig	Third party mailing service charge for mailing plan and scheduling order to non-voting creditors	1.00	176.13	\$176.13
07/25/23	Mac VerStandig	Third party mailing service charge for mailing plan, scheduling order, and Class 3 ballot	1.00	4.40	\$4.40

Hours	12.70
Labor:	\$5,080.00
Invoice Amount:	\$5,332.55

Total Hours:	57.40
Total Labor:	\$22,680.00
Total Expenses:	\$252.55
Total Invoice Amount:	\$22,932.55
Total Amount Due:	\$22,932.55

User Summary

User	Hrs	Rate	Amount
Mac VerStandig	56.70	@ 400.000	22,680.00
Mac VerStandig	0.70	@ N/C	0.00

Trust Account

The Trust Activity shown here is from the previous Invoice date of 04/24/23

Date	Trust Account	Description	Debit	Credit	Balance
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Matter : Non-Matter Related**C. Glenn - Trust Acct.**

	C. Glenn - Trust Acct.	Trust account balance forward as of 04/24/23	0.00	25,000.00	25,000.00
04/24/23	C. Glenn - Trust Acct.	Pre-filing payment of invoice	4,538.00	0.00	20,462.00

Trust account ending balance as of 09/03/23 for C. Glenn - Trust Acct.:	20,462.00
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Exhibit A- Time and Expense Records Page 7 of 7

Trust account ending balance as of 09/03/23 for Non-Matter Related:	<u>20,462.00</u>
Total for Chris Glenn:	<u>20,462.00</u>